

1 BETSY C. MANIFOLD (182450)  
2 RACHELE R. BYRD (190634)  
3 ALEX J. TRAMONTANO (276666)  
4 **WOLF HALDENSTEIN ADLER**  
5 **FREEMAN & HERZ LLP**  
6 750 B Street, Suite 1820  
7 San Diego, CA 92101  
8 Telephone: (619) 239-4599  
9 Facsimile: (619) 234-4599  
10 manifold@whafh.com  
11 byrd@whafh.com  
12 tramontano@whafh.com

13 *Attorneys for Plaintiff*

14 [Additional Counsel on Signature Page]

15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 ROBERT LALOR, derivatively on behalf of  
18 PAYPAL, INC.,

19 Plaintiff,

20 v.

21 DANIEL H. SCHULMAN, JOHN D. RAINEY,  
22 RODNEY C. ADKINS, JONATHAN  
23 CHRISTODORO, JOHN J. DONAHOE, DAVID  
24 W. DORMAN, BELINDA J. JOHNSON, GAIL J.  
25 MCGOVERN, DEBORAH M. MESSEMER,  
26 DAVID M. MOFFETT, ANN M. SARNOFF,  
27 FRANK D. YEARY, and WENCES CASARES,

28 Defendants,

and

PAYPAL HOLDINGS, INC.,

Nominal Defendant.

Case No. 5:22-cv-00370

**NOTICE OF ERRATA REGARDING  
MISSING EXHIBIT TO VERIFIED  
SHAREHOLDER DERIVATIVE  
COMPLAINT**

1 **TO THE COURT, ALL PARTIES, AND THEIR RESPECTIVE ATTORNEYS OF**  
2 **RECORD:**

3 **PLEASE TAKE NOTICE** that the Verification to Plaintiff Robert Lalor's Verified  
4 Shareholder Derivative Complaint (ECF No. 1) (the "Complaint") was inadvertently omitted.  
5 Plaintiff intended to file the attached Verification as Exhibit A to the Complaint and files this Notice  
6 of Errata and the Verification as Exhibit A hereto to correct the error.

7 DATED: January 19, 2022

**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLP**

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9 By: /s/ Rachele R. Byrd  
RACHELE R. BYRD

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14 Facsimile: (619) 234-4599  
manifold@whafh.com  
15 byrd@whafh.com  
16 tramontano@whafh.com

17 **MOORE KUEHN, PLLC**  
Justin A. Kuehn  
18 Fletcher W. Moore  
30 Wall Street, 8th floor  
19 New York, New York 10005  
Tel: (212) 709-8245  
20 jkuehn@moorekuehn.com  
fmoore@moorekuehn.com

21 **RIGRODSKY LAW, P.A.**  
Seth D. Rigrotsky  
22 Timothy J. MacFall  
23 Vincent A. Licata  
825 East Gate Boulevard, Suite 300  
24 Garden City, NY 11530  
Tel: (516) 683-3516  
25 sdr@rl-legal.com  
26 tjm@rl-legal.com  
27 vl@rl-legal.com

*Attorneys for Plaintiff*


28  
NOTICE OF ERRATA REGARDING MISSING EXHIBIT TO  
VERIFIED SHAREHOLDER DERIVATIVE COMPLAINT  
CASE No. 5:22-CV-00370

# **EXHIBIT A**

**VERIFICATION**

I, Robert Lalor, have reviewed the allegations made in this Verified Shareholder Derivative Complaint, know the contents thereof, and authorize its filing. To those allegations of which I have personal knowledge, I believe those allegations to be true. As to those allegations of which I do not have personal knowledge, I rely upon my counsel and their investigation and believe them to be true. I further declare that I am a current holder, and have been a holder, of PayPal Holdings, Inc. common stock at all relevant times.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this <sup>ROBERT LALOR</sup> \_\_\_\_\_ day of January 2022.

  
ROBERT LALOR (Jan 17, 2022 10:16 EST)

ROBERT LALOR